

1 THE LAW OFFICE OF RICHARD G.  
2 CAMPBELL, JR. INC.  
3 RICHARD G. CAMPBELL, JR. (Bar No. 1832)  
4 333 Flint Street  
5 Reno, NV 89501  
6 Telephone: (775) 384-1123  
7 Facsimile: (775) 686-2401  
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9 MELANIE D. MORGAN (Bar No. 8215)  
10 TENESA SCATURRO POWELL (Bar No. 12488)  
11 Thomas G. Pasternak (*pro hac vice*)  
12 John M. Schafer (*pro hac vice*)  
13 AKERMAN LLP  
14 1635 Village Center Circle, Suite 200  
15 Las Vegas, NV 89134  
16 Tel: 702.634.5000  
17 Fax: 702.380.8572  
18 melanie.morgan@akerman.com  
19 tenesa.scaturro@akerman.com  
20 thomas.pasternak@akerman.com  
21 jay.schafer@akerman.com

22 *Counsel for Defendant Zmodo Technology*  
23 *Corporation Limited*

24  
25 **UNITED STATES DISTRICT COURT**  
26 **DISTRICT OF NEVADA**

27 EYETALK365, LLC,  
28  
29 Plaintiff,

30 v.

31 ZMOD0 TECHNOLOGY CORPORATION  
32 LIMITED,

33 Defendant.

34 ZMOD0 TECHNOLOGY CORPORATION  
35 LIMITED,

36 Counter Claimant,

37 v.

38 EYETALK365, LLC,

39 Counter Defendant.

Case Nos. 2:17-cv-02714-RCJ-PAL;  
3:17-cv-00686-RCJ-PAL

**MOTION TO SUBSTITUTE RESIDENT  
COUNSEL**

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1 Pursuant to LR 11-6(c), Defendant/Counterclaim Plaintiff Zmodo Technology Corporation,  
2 LTD. ("Zmodo") hereby moves this court to substitute local counsel in Case Nos 2:17-cv-02714-  
3 RCJ-PAL ("2714 Case") and 3:17-cv-00686-RCJ-PAL ("686 Case"). Zmodo had previously  
4 designated Melanie D. Morgan of AKERMAN LLP as associate resident Nevada counsel. (See 2714  
5 Case, ECF Nos. 92, 93; 686 Case, ECF Nos. 25, 26) Zmodo now seeks to designate Richard G.  
6 Campbell, Jr. of the LAW OFFICE OF RICHARD G. CAMPBELL, JR. INC. as resident counsel. See Ex. A.

7 Discovery in this matter does not close until November 16, 2018. (See 2714 Case, ECF  
8 No. 111; 686 Case, ECF No. 36). Mr. Campbell has already filed a notice of association of counsel  
9 in each case (see 2714 Case, ECF No. 106; 686 Case, ECF No. 35), and is thus aware of the  
10 respective deadlines set by the Court. Additionally, Thomas G. Pasternak and John M. Schafer of  
11 AKERMAN LLP, both of whom have been admitted *pro hac vice* in these cases (see 2714 Case, ECF  
12 Nos. 94, 95; 686 Case, ECF Nos. 27, 28), will continue to represent Zmodo. Accordingly,  
13 discovery and trial deadlines will not be affected by the requested substitution of resident counsel.  
14 Therefore, Zmodo respectfully requests that this Court grant the motion to substitute resident  
15 counsel.

16  
17 Dated: May 18, 2018

18  
19 **THE LAW OFFICE OF RICHARD G.  
CAMPBELL, JR. INC.**

20 /s/ Richard G. Campbell, Jr.

21 THE LAW OFFICE OF RICHARD G.  
22 CAMPBELL, JR. INC.  
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Reno, NV 89501  
Telephone: (775) 384-1123  
Facsimile: (775) 686-2401  
rcampbell@rgclawoffice.com

23 **IT IS SO ORDERED** this 22nd day  
24 of May, 2018.

25 

26 Peggy A. Leen  
27 United States Magistrate Judge  
28

MELANIE D. MORGAN  
Bar No. 8215  
TENESA SCATURRO POWELL  
Bar No. 12488  
Thomas G. Pasternak (*pro hac vice*)

1 John M. Schafer (*pro hac vice*)  
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*Counsel for Defendant Zmodo Technology  
Corporation Limited*

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that a true and correct copy of the foregoing was electronically filed this 18th  
3 day of May, 2018, using the Court's CM/ECF system and served via email on the following counsel:

4 Gary R. Sorden (gary.sorden@klemchuk.com)

5 Michael D. Rounds (mrounds@bhfs.com)

6 Tim J. H. Craddock (tim.craddock @klemchuk.com)

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10 /s/ John M. Schafer  
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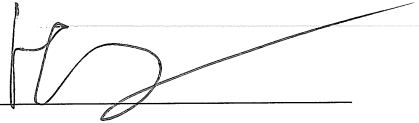
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3:17-cv-00686-RCJ-PAL

**SUBSTITUTION OF RESIDENT  
COUNSEL**

40 //

1 Pursuant to LR 11-6(c), Defendant/Counterclaim Plaintiff Zmodo Technology  
2 Corporation, Inc. hereby substitutes as associate resident Nevada counsel Richard G. Campbell,  
3 Jr. of the LAW OFFICE OF RICHARD G. CAMPBELL, JR. INC. in the place and stead of Melanie D.  
4 Morgan of AKERMAN LLP.

5 DATED this 9 day of May, 2018



Zmodo Technology Corporation, Ltd.

8  
9 I consent to the above substitution.

10 DATED this \_\_\_\_ day of May, 2018

11 \_\_\_\_\_

12 Melanie D. Morgan

13  
14 I hereby accept the above and foregoing substitution as associate resident Nevada counsel.

15 DATED this \_\_\_\_ day of May, 2018

16 \_\_\_\_\_

17 Richard G. Campbell, Jr.  
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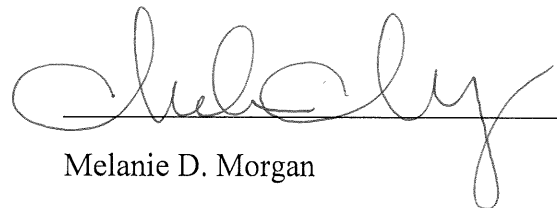
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4 AKERMAN LLP.

5 DATED this \_\_\_\_ day of May, 2018

6  
7 \_\_\_\_\_  
8 Zmodo Technology Corporation, Ltd.

9 I consent to the above substitution.

10 DATED this 10<sup>th</sup> day of May, 2018

11 \_\_\_\_\_  
12   
13 Melanie D. Morgan

14 I hereby accept the above and foregoing substitution as associate resident Nevada counsel.

15 DATED this \_\_\_\_ day of May, 2018

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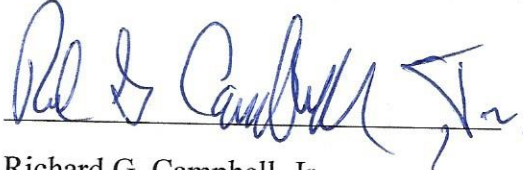
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10 DATED this \_\_\_\_ day of May, 2018

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12 \_\_\_\_\_  
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15 DATED this 9 day of May, 2018

16  
17   
18 Richard G. Campbell, Jr.